

**ENVIRONMENTAL MANAGEMENT PLAN
FLEET REC PARK CONSTRUCTION
NAVAL STATION NORFOLK
NORFOLK, VIRGINIA**

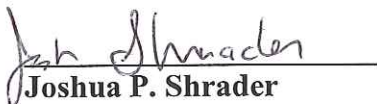
October 28, 2008

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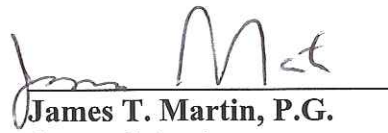

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ATTACHMENT I

Table of Inspection Guidance

1.0 INTRODUCTION

Marshall Miller & Associates (MM&A) prepared this *Environmental Management Plan* for the Virginia Department of Transportation's (VDOT's) project to construct a recreational facility called Fleet Rec Park (FRP) at the Naval Station Norfolk (NSN) in Norfolk, Virginia. This new park will replace a portion of the existing park that will be impacted with the future improvements to Route 337 and Interstate 564. The new FRP will be built on the Camp Allen Salvage Yard (CASY) and the Camp Allen Landfill (CALF), which are Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) units. This plan's purpose is to address environmental requirements in the license agreement between VDOT and the Navy pertaining to an *Environmental Management Plan* and an Environmental Site Manager (ESM). VDOT's prime contractor for this project is Henderson, Inc., which will be responsible for submitting the other project plans such as *Health and Safety Plan*, *Materials Handling Plan* and *Field Sampling and Laboratory Testing Plan for Soils and Groundwater*.

2.0 ENVIRONMENTAL SITE MANAGER

The license agreement requires VDOT to provide an ESM for this project. The ESM is to be competent in environmental compliance and pollution prevention and will oversee day-to-day compliance. The requirements as taken from the license agreement are presented as follows.

These persons whose designation and authority must be set forth in writing, a copy of which must be provided to the Licensor's Site Manager, must be trained in hazardous waste handling, to ensure that waste segregation and compatibility requirements are met; hazardous waste management, including transportation and storage; and dewatering operations including pretreatment. These persons must also ensure that contractor personnel are trained for the work they will perform, maintain necessary records, report spills and releases and coordinate first responses to spills and releases. Additionally, these persons must be present during all excavations that may penetrate the engineering soil cover, remedy site work, construction of sports lighting structures, dewatering

operations and commissioning and decommissioning of groundwater pre-treatment equipment. These persons shall serve as VDOT's emergency points of contact.

VDOT's primary ESM will be Mr. James Martin of Marshall Miller and Associates, Inc. Mr. Martin has been involved with VDOT's planning throughout this project and has conducted multiple on-site investigations to obtain the information needed for the FRP design. He has over 14 years of experience in the environmental industry, is certified as a Professional Geologist (P.G.), is a Registered Hazardous/Chemicals Materials Manager and has received Occupational Safety and Health Administration (OSHA) training under the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard as a Site Manager. Mr. Martin's contact information is as follows:

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E-mail address: james.martin@mmal.com

Others to also serve in the role as ESM will be the VDOT Hazardous Materials Managers from the Hampton Roads District: Mr. Michael Sarros and Mr. Andrew Winch. Both are environmental professionals who have been involved with VDOT's planning throughout this project and are OSHA HAZWOPER trained as a Site Manager. Their contact information is as follows:

Michael J. Sarros
Virginia Department of Transportation
1001 Obici Industrial Boulevard
Suffolk, Virginia 23434

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The ESM's will conduct and/or coordinate the activities to verify contractor compliance with environmental regulations. These ESM's may elicit additional support to properly supervise construction activities such as through the construction inspectors that will be present and/or additional environmentally trained personnel.

The Navy's Licensor Site Manager contacts are as follows:

Mark Airaghi
PWD Norfolk

Office phone: (757) 445-8941
E-mail address: mark.airaghi@navy.mil

Mr. Jan Sutton
PWD Norfolk

Office phone: (757) 445-7254
E-mail address: jan.sutton@navy.mil

3.0 ENVIRONMENTAL MANAGEMENT PROCEDURES

The procedures to be implemented for environmental compliance shall consist of the following:

- Review documents, permits and plans.
- Conduct meetings prior to initiating work.
- Inspect construction activities.
- Document and report.

3.1 DOCUMENT REVIEW PHASE

The first task for the ESM's will be to compile all pertinent documents related to the project. The first document is entitled VDOT's Bid Proposal and Contract (Volumes I and II), which contain the following:

- Navy's Technical Memorandum-Construction Restrictions for Navy Property,
- Navy's Technical Memorandum-Dewatering Requirements For the I-564 Intermodal Connector Project in the Camp Allen Area,
- Special Provisions for Management of Contaminated Groundwater,
- Special Provisions for Management and Disposal of Contaminated Soil, and
- Special Provisions for Navy License Agreement Requirements.

In addition, the ESM will review the plans prepared by VDOT's contractor (Henderson, Inc.), which will include the following:

- Health and Safety Plan,
- Excavation and Material Handling Plan, and
- Field Sampling and Laboratory Testing Plan for Soil and Groundwater.

3.2 MEETING PHASE

Meetings have been held prior to initiation of the site work. The attendees have included Navy representatives (including the Navy's Licensor manager) and VDOT's team including the ESM's. During those meetings, implementation procedures of the environmental requirements for this project were discussed.

3.3 CONSTRUCTION INSPECTION PHASE

The ESM's responsibilities will consist of inspecting construction activities and documenting compliance. The ESM duties are summarized on **Table 1**, which is attached.

The ESM has authority over the contractor (Henderson) and its sub-contractors while on-site for compliance with environmental law. This authority is granted by the *VDOT Special Provision for Navy License Agreement Requirements* specified in the contract and by this *Environmental Management Plan*. Should a construction activity potentially compromise compliance with environmental regulations or environmental requirements of this project, the ESM has authority to stop work until further evaluated and resolved. The official stop work procedure for the ESM will be to inform VDOT's Senior Construction Inspector along with the contractor. Potential issues that need the Navy's assistance to resolve will be communicated to the Navy Licensor Site Manager.

3.4 DOCUMENTATION

The ESM's will document the inspections in dedicated field books and/or inspection forms as a record keeping measure. Copies will be made on a weekly basis and submitted to the Navy Licensor Manager and VDOT Project Manager.

TABLE 1
ENVIRONMENTAL SITE MANAGER
INSPECTION GUIDANCE DUTIES
FLEET REC PARK RE-LOCATION

ACTIVITY	CONSTRUCTION ITEM	MINIMUM FREQUENCY
Safety	Subsurface activities (dewatering and excavation) and waste handling.	Contractor is responsible for the safety of their employees and subcontractors. ESM will monitor that such activities are conducted by HAZWOPER trained personnel.
Excavations that Penetrate CASY Soil Cover	Excavations below the 5-foot characterization zone	100% of time
	Excavations within the 5-foot characterization zone.	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion. Additionally, 100% of time in CALF.
	Light pole base foundation installation.	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion.
	Cover restoration for each utility/foundation	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion.
Restoration of One Foot Soil CASY Cover	Installation of Pre-Treatment Equipment and Connection to the CATP	100%
Dewatering	Installation of Piezometers and Measurement of Groundwater Levels	100%
	Dewatering for each utility/foundation	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion.
	Pre-treatment operation and water delivery to CATP	Start up and until confidence is established (including with each subcontractor), then twice daily inspections.
	Decontamination/disposal of dewatering equipment (including pre-treatment equipment)	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion.
	Decommissioning of CATP	100%
	Segregation, storage, loading and hauling	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion. Additionally, 100% of time in CALF.
Waste Handling	Removal of pre-treatment plant residuals	100%
Incidental Soil Management	Fencing, low level lighting	Start up and until confidence is established (including with each subcontractor), then routine checks until conclusion.
Spills	Reporting of any spills/releases to the Navy.	100%
Unforeseen Discoveries	Reporting of unforeseen discoveries to the Navy.	100%

ESM = Environmental Site Manager
 CASY = Camp Allen Salvage Yard
 CALF = Camp Allen Landfill
 CATP = Camp Allen Treatment Plant
 HAZWOPER = Hazardous Waste Operations and Emergency Response Standard